

REMARKS

Claims 1-28 are pending in the application.

Claims 1-28 have been rejected.

Claims 1, 3, 10, 13, 15, and 22 have been amended.

Claim 29 has been added.

Double Patenting

Claims 1-28 are rejected under 35 U.S.C. § 101 statutory “same invention” type double patenting. The claims are rejected as purportedly being unpatentable over claims 1-6, 8-18, 20-24 and 27-28 of U.S. Application No. 10/688,425. Applicants respectfully traverse this rejection. Applicants note that the claims in both the present application and U.S. Application No. 10/688,425 have been amended and are not coextensive in scope. Applicants also note that the claims in U.S. Application No. 10/688,425 are subject to a non-statutory double patenting rejection. Even if this non-statutory double patenting rejection were well-formed (a point Applicants do not concede), it is clear evidence that no basis exists for the statutory double patenting rejection in this case. Applicants therefore believe that the double patenting rejection of the claims in the present invention can be obviated by a terminal disclaimer. Applicants will file a terminal disclaimer in the future if necessary.

Rejection of Claims under 35 U.S.C. §101

Claims 10, 11 and 12 stand rejected under 35 U.S.C. §101 because the claimed invention is purportedly directed to non-statutory subject matter. Applicants respectfully traverse this rejection. In order to expedite prosecution, Applicants have chosen to amend claim 10. The claims, as amended, recite a data structure configured to facilitate translation stored on a machine-readable medium.

The Office Action states that the claimed data structure is non-functional descriptive material. Applicants respectfully submit that amended claim 10 does not recite non-functional descriptive material. The MPEP defines functional descriptive

material as “data structures and computer programs which impart functionality when employed as a computer component.” MPEP 2106.01. Clearly the claimed data imparts functionality when employed. That is, the claimed data structure facilitates translation. Therefore the claimed data structure is, at least, functional descriptive material. Accordingly, Applicants respectfully request withdrawal of this rejection.

Rejection of Claims under 35 U.S.C. § 103(a)

Claims 1-28 stand rejected under 35 U.S.C. § 103(a) as purportedly being unpatentable over U.S. Patent No. 7,043,687 issued to Knauss, et al. (“Knauss”), and further in view of U.S. Patent No. 6,591,260 issued to Schwarzhoff, et al. (“Schwarzhoff”), and further in view of NPL_XML_Schema_CE (“XML”). Applicants respectfully traverse this rejection. Applicants respectfully submit that the cited portions of Knauss, Schwarzhoff, and XML fail to disclose each feature of claim 1, which has been amended to recite:

1. A method comprising:
 - receiving invoice adjustment information in an application-specific data object format from each of a plurality of processing systems, wherein each processing system comprises an application, the invoice adjustment information is received at a transport layer, and the invoice adjustment information comprises
 - an identification data element;
 - invoice adjustment base data element;
 - a billing data element;
 - a status data element; and
 - a list of invoice adjustment line item details data element;
 - receiving configuration information relating to the processing systems at the transport layer, wherein
 - the configuration information is received via an adapter; and
 - translating the invoice adjustment information into a common invoice adjustment data object format, wherein
 - the translating is performed by a processor, and
 - the translating comprises:
 - accessing a first storing unit configured to store transformation information, wherein the first storing unit is coupled to the processor,
 - accessing a second storing unit, wherein the second storing unit stores at least one business process, and

the second storing unit is coupled to the processor,
 executing the at least one business process in response to a
 predefined event, and
 the common invoice adjustment data object format comprises
 at least one relationship data element, wherein
 the relationship data element specifies at least one
 relationship between a plurality of entities,
 and
 at least one custom data element, wherein
 the custom data element facilitates customization of
 the common invoice adjustment data object
 format.

For example, Applicants respectfully submit that the proposed combination of Knauss, Schwarzhoff, and XML fails to disclose receiving invoice adjustment information comprising an identification data element, an invoice adjustment base data element, a billing data element, a status data element, and a list of invoice adjustment line item details data element. The Office Action admits that Knauss fails to disclose these features of claim 1. Office Action, p. 6. The Office Action states that XML discloses complex data elements which may be defined as needed and Swarzhoff discloses redefining or adding an extension to an element in a pre-existing document type. *Id.* The Office Action states that it would have been obvious to combine these features with Knauss and that such combination discloses the claimed features. *Id.* Applicants respectfully submit that such combination would not have been obvious, at least because Knauss depends on predefined mappings and explicitly discloses that any changes require the creation of a new map. *See* Knauss 8:38-42. Applicants respectfully submit that attempting to include redefinable data elements in a system which relies upon pre-defined mappings (and requires remapping in response to changes to a document type) would have unpredictable results, at best. Thus, the purported disclosure by XML and Schwarzhoff of defining elements “as needed” is fundamentally incompatible with Knauss. Furthermore, even if such teachings could somehow be combined without impermissibly changing the principle of operation of one or more of the references (which Applicants maintain is not the case) the Office Action has still not pointed to any portions of the cited references that disclose the claimed features.

Applicants respectfully submit that the proposed combination of Knauss, Schwarzhoff, and XML also fails to disclose a common invoice adjustment data object format comprising a relationship data element that specifies a relationship between entities. This element is included in amendments to claim 1 submitted herewith. Support for this amendment is found, at least, at Applicants' Specification ¶ [0033] and FIG. 4B. As disclosed in Applicants' Specification the claimed common data object format allows relationships between entities to be modeled as attributes for that entity. Applicants respectfully submit that the cited portions of Knauss, Schwarzhoff, and XML fail to disclose including such entity-specific information in a common data object format. For example, Knauss explicitly discloses requiring a state domain database external to Knauss's virtual document interface to provide data related to the target in a source-independent fashion. *See* Knauss 6:43-51. That is, the cited portions of Knauss fail to disclose preserving a relationship between entities in a common data object format.

Applicants respectfully submit that the remarks made above with regard to claim 1 apply with equal force to claims 10, 13, and 22, which contain substantially similar limitations. For at least the foregoing reasons, Applicants respectfully request the Examiner's reconsideration and withdrawal of the rejections to these claims and an indication of the allowability of same. Applicants further request Examiner's reconsideration and withdrawal of the rejections to claims 2-9, 11, 12, 14-21, and 23-29, which depend from allowable base claims 1, 10, 13, and 22, respectively.

Applicants have added new claim 29, which recites specifying a level of compatibility with a data object format of a first application, wherein the determining the essential data elements facilitates achieving the specified level of compatibility. Support for this claim is found, at least, at ¶ [0019] of Applicants' Specification. No new matter is added. Applicants respectfully submit that claim 29 recites features not disclosed by the proposed combination of Knauss, Schwarzhoff, and XML.

CONCLUSION

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5092.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to Deposit Account 502306.

Respectfully submitted,



Shawn Doman
Attorney for Applicants
Reg. No. 60,362
Telephone: (512) 439-5092
Facsimile: (512) 439-5099